

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STACY PEREZ,)	
)	
Plaintiff,)	
)	
v.)	No. 1:20 cv 06186
)	
CITY OF CHICAGO and CHICAGO)	
POLICE OFFICERS HANLON, #3043,)	
PEREZ, #16182, and UNKNOWN)	
OFFICERS,)	
)	
Defendants.)	

PLAINTIFF’S MOTION TO WITHDRAW

NOW COME the Plaintiff’s current counsel, Angela Lockett and Jeanette Samuels of Shiller Preyar Jarard and Samuels, and respectfully moves to withdraw the appearances of all of current Plaintiff’s counsel, and in support states as follows

1. Undersigned Counsel and Plaintiff have opposite opinions as to how best to proceed with this litigation. Despite multiple attempts to reach a consensus, counsel and Plaintiff are unable to agree as to the path forward.
2. Accordingly, attorneys Angela Lockett and Jeanette Samuels seek leave to withdraw their appearances on behalf of Plaintiff, and asks this Court to allow Plaintiff a reasonable amount of time to secure new counsel.
3. The Rules of Professional Conduct permit an attorney to withdraw from representation when “the client insists upon taking action...which the lawyer has

a fundamental disagreement” or “the representation ... has rendered unreasonably difficult by the client.” Rule 1.6(b)(4); Rule 1.6(b)(6).

4. Per the local rule, Notification of Party Contact Information is being filed as Exhibit A to this motion.
5. Additionally, a copy of the motion and notice of motion are being served on Plaintiff via email and U.S. mail with a letter admonishing Plaintiff that she must appear in court herself or with a substitute attorney at the hearing on the instant motion.
6. Finally, the undersigned will provide Plaintiff with a copy of her entire file, including all documents produced in discovery by all parties, and all documents provided by Plaintiff.

CONCLUSION

WHEREFORE attorneys Angela Lockett and Jeanette Samuels respectfully request leave of Court to withdraw as attorneys of record for Plaintiff and that Plaintiff be given sufficient time to secure new counsel, and that the court deadlines be stayed or extended, and for any other relief the Court deems equitable and just.

Dated: 14 May 2021

Respectfully Submitted,

By: /s/ Angela Lockett
One of Plaintiffs' Attorneys
By: /s/ Jeanette Samuels
One of Plaintiffs' Attorneys

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CERTIFICATE OF SERVICE

The undersigned counsel swears, on oath, that a true and complete copy of the foregoing was served on all counsel of record via the Court's online electronic filing system on 14 May 2021.

/s/ Jeanette Samuels